INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.state.in.us/idem

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Genpak, LLC
845 South Elm Street
Scottsburg, Indiana 47170

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T143-11375-00016	
Issued by: Original signed by Janet G. McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 20, 2002 Expiration Date: March 20, 2002

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary polystyrene foam extrusion operation.

Responsible Official:	Edward W. Rider, Jr.
Source Address:	845 South Elm Street, Scottsburg, Indiana, 47170
Mailing Address:	845 South Elm Street, Scottsburg, Indiana, 47170
General Source Phone Number:	812-752-3111
SIC Code:	3089
County Location:	Scott
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Three (3) polystyrene foam tandem extruders, identified as EPS-1, EPS-2 and EPS-3, each extruding a maximum of 1,400 pounds per hour polystyrene, utilizing a Recuperative Thermal Oxidizer as control and exhausting through INCIN-1;

(b) One (1) Recuperative Thermal Oxidizer with a rated heat input of 1.0 million British thermal units (mmBtu) per hour, and exhausting through INCIN-1. This unit will control VOC emissions of the existing foam extrusion operation;

(c) One (1) polystyrene foam scrap regrinder, with a maximum capacity of 1266 pounds per hour, using fabric filters as control;

(d) Mold machines, identified as M-1, molding a maximum of 833 pounds per hour of resin injected with pentane, and exhausting to the interior of the building,

(e) Pre-Expansion Room, identified as the Pre-Expansion Room, expanding a maximum of 833 pounds per hour of resin injected with pentane, utilizing a boiler to control VOC emissions, exhausting to S-1, and consisting of:

(1) Material Preparation,
(2) Pre-Expander, identified as PE-1,
(3) Pre-Puff, identified as PP-1, and
(4) One (1) natural gas fired boiler with a rated heat input of 20.9 mmBtu per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6; [326 IAC 8-3-2] [326 IAC 8-3-5]

(b) Paved and unpaved roads and parking lots with public access; [326 IAC 6-4 and 326 IAC 6-5]

(c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blating; pneumatic conveying and woodworking operations;[326 IAC 6-3] and

(d) Other activities or categories of activities with emissions equal to or less than insignificant thresholds:

(1) One (1) 30,000 gallons storage tank, constructed on December 1, 1998, containing the blowing agents (confidential information) for the ECPET-1 extruder. [326 IAC 12][40 CFR 60.110, Subpart Kb]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

(c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determinations regarding this source:

(1) Operation Permit CP-143-9047-00016, issued on April 3, 1998

Condition D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

That pursuant to 326 IAC 8-1-6 (General Reduction Requirements), the source shall comply with the following requirements:

(A) The blowing agent used on the polystyrene extrusion line shall be limited to 181 tons per 365-day period, rolled on a daily basis. This limit is based on the assumption that the loss of blowing agent during extrusion, warehousing, and thermoforming is 8% and the loss of blowing agent during regrind is 100%. This limit is equivalent to potential to emit (PTE) VOC of 63 tons per 365-day period. This is equivalent to 14.38 pounds VOC per hour. Any change or modification to this facility shall allow for OAQ to re-open this analysis.

(B) The blowing agent used on the CPET extrusion line shall be limited to 86 tons per 365 day period, rolled on a daily basis. This limit is based on the assumption that the loss of blowing agent during extrusion, warehousing, and thermoforming is 30% and the loss of blowing agent during regrind is 80%. This limit is equivalent to potential to emit (PTE) VOC of 43 tons per 365-day period. This is equivalent to 9.81 pounds VOC per hour. Any change or modification to this facility shall allow for OAQ to re-open this analysis.

(C) If any additional extrusion lines are added to this source, even if their individual volatile organic compound (VOC) emissions are less than twenty-five (25) tons per year, or if the blowing agent is to be changed to another type (Confidential Information), a new Best Available Control Technology (BACT) analysis will be performed for all VOC emission units at the source. The BACT options for the previously permitted emission units shall be re-evaluated.

Reason not incorporated: The VOC and BACT requirements of Operation Permit CP-143-9047-00016, issued on April 3, 1998 have been superseded by the requirements of Operation Permit 143-9851-00016, issued on November 19, 1998, which requires the use of a Thermal Oxidizer as BACT.

(2) Operation Permit CP-143-9047-00016, issued on April 3, 1998

Condition D.1.2 Testing Requirements [326 IAC 2-1-3]
That pursuant to 326 IAC 2-1-3 (Construction and Operating Permit Requirements) compliance stack tests shall be performed for percentage blowing agent lost and actual volatile organic compound (VOC) emissions from the polystyrene foam extrusion line and the CPET foam extrusion line within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up. These tests shall be performed according to 326 IAC 3-2.1 (Source Sampling Procedures) using the methods specified in the rule or as approved by the Commissioner.

(A) A test protocol shall be submitted to the OAQ, Compliance Data Section, 35 days in advance of the test.

(B) The Compliance Data Section shall be notified of the actual test date at least two (2) weeks prior to the date.

(C) All test reports must be received by the Compliance Data Section within 45 days of completion of the testing.

(D) Whenever the results of the stack test performed exceed the level specified in this permit, appropriate corrective actions shall be implemented within thirty (30) days of receipt of the test results. These actions shall be implemented immediately unless notified by OAQ that they are acceptable. The Permittee shall minimize emissions while the corrective actions are being implemented.

(E) Whenever the results of the stack test performed exceed the level specified in this permit, a second test to demonstrate compliance shall be performed within 120 days. Failure of the second test to demonstrate compliance may be grounds for immediate revocation of this permit to operate the affected facility. Compliance Monitoring Requirements [326 IAC 2-7-6(1)]

Reason not incorporated: The VOC testing requirements of Operation Permit CP-143-9047-00016, issued on April 3, 1998 have been superseded by the requirements of Operation Permit 143-9851-00016, issued on November 19, 1998, which requires VOC testing of the Thermal Oxidizer.

(3) Operation Permit CP-143-9047-00016, issued on April 3, 1998

Condition D.1.3 Best Available Control Technology (BACT) Requirements [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the source shall comply with the following requirements:

(A) During off-loading of blowing agents (Confidential Information) the atmosphere in the storage vessel is vented back to the delivery tanker or rail car instead of being vented to the ambient air.

(B) All transfer piping conveying blowing agent from the storage vessel to the facility operations is double walled. Interstitial monitoring is present to detect leaks from the inner piping or flanges.

(C) All tubing in the plant is high pressure usage tested for integrity following installation.

(D) Combustible gas meters are present in the process areas to detect the presence of blowing agent (Confidential Information). If blowing agent (Confidential Information) is detected, the source will be investigated through visual or gas detection inspection. Any leaks will be repaired.

(E) During extrusion, immediately in front of the die lips is an area of unexpanded gel known as the halo. Air rings inside and outside of the sheet apply air directly to the halo to properly skin the foam, thus reducing the emission of blowing agent into the atmosphere during extrusion.

(F) Visual inspections of all tubing and equipment for possible VOC emission leaks shall be performed once per shift.

(G) Daily inspections of the two (2) foam tandem extruders shall be performed to verify that there are no possible malfunctions in the operation.

(H) All readily visible and exposed piping and tubing shall be inspected daily for any possible leaks.

(I) The combustible gas meters shall be calibrated once per month.

(J) The unexpanded gel known as the halo shall be inspected daily to verify they are operating properly.

Reason not incorporated: The VOC and BACT requirements of Operation Permit CP-143-9047-00016, issued on April 3, 1998 have been superseded by the requirements of Operation Permit 143-9851-00016, issued on November 19, 1998, which requires the use of a Thermal Oxidizer as BACT.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permit Conditions Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy any records that must be kept under the conditions of this permit;

(c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.12 Temperature Gauge Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of temperature at any part of the unit or its control device, the instrument employed shall have a scale such that deviations of plus or minus 28 degrees Celsius around the expected normal reading shall be easily documented and be accurate within plus or minus one percent (±1%) in degrees Celsius.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.
The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Response Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) Three (3) polystyrene foam tandem extruders, identified as EPS-1, EPS-2 and EPS-3, each extruding a maximum of 1,400 pounds per hour polystyrene, utilizing a Recuperative Thermal Oxidizer as control and exhausting through INCIN-1;

(b) One (1) Recuperative Thermal Oxidizer with a rated heat input of 1.0 million British thermal units (mmBtu) per hour, and exhausting through INCIN-1. This unit will control VOC emissions of the existing foam extrusion operation; and

(c) One (1) polystyrene foam scrap regrinder, with a maximum capacity of 1266 pounds per hour, using fabric filters as control.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to Significant Source Modification 143-12416-00016, issued on December 05, 2000, and 326 IAC 8-1-6, the Best Available Control Technology (BACT) for the polystyrene foam extrusion operation (including EPS-1, EPS-2, and EPS-3) has been determined to be VOC emission control by a recuperative thermal oxidizer controlling exhaust from the repelletizer for the polystyrene foam extrusion operation (including EPS-1, EPS-2 and EPS-3). The BACT requires a 85% capture efficiency and a 95% destruction efficiency through the utilization of a RTO, which is equivalent to VOC emissions from the polystyrene foam extrusion of less than 170.43 tons per twelve (12) consecutive month period. The source shall meet the following:

(a) The recuperative thermal oxidizer shall be used at all times that the polystyrene foam repelletizing process is in operation.

(b) That usage of VOC, delivered to the polystyrene foam extrusion operation (including EPS-1, EPS-2 and EPS-3) shall be limited to 906.66 tons per 12 month consecutive period. This is equivalent to VOC emissions of 170.43 tons per 12 month consecutive period from the polystyrene foam extrusion operation (including EPS-1, EPS-2, and EPS-3). During the first 12 months of operation, VOC usage shall be limited such that the total VOC used divided by accumulated months of operation shall not exceed the limits specified.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the polystyrene foam scrap regrind operation shall not exceed 3.02 pounds per hour when operating at a process weight rate of 1266 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour;

P = process weight rate in tons per hour

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Particulate Matter (PM)

In order to comply with Condition D.1.2, the fabric filters for PM control shall be in operation and control emissions from the polystyrene foam scrap regrind operation at all times that this facility is in operation.

D.1.5 Recuperative Thermal Oxidizer

(a) The recuperative thermal oxidizer shall operate at all times that the process is in operation. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1,400 ^{0}F and minimum operating fan amperage of 6.6 amps during operation, as approved by IDEM. The temperature correlates to an 85% capture efficiency and a 95% destruction efficiency based on the stack capture and destruction efficiency test.

(b) When operating the thermal oxidizer to achieve compliance with 326 IAC 8-1-6, the thermal oxidizer shall maintain a minimum 85% capture efficiency and a 95% destruction efficiency. These efficiencies and the use of the thermal oxidizer are required by the Best Available Control Technology (BACT) for the polystyrene foam extrusion operation (including EPS-1, EPS-2 and EPS-3).

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

To demonstrate compliance with the minimum 85% capture efficiency and a 95% destruction efficiency required by condition D.1.1, the Permittee performed VOC testing on October 14, 1999, utilizing Method 25 or other methods as approved by the Commissioner, to determine proper operating parameters for the thermal oxidizer, including minimum operating temperature and fan amperage that will achieve 85% capture efficiency and a 95% destruction efficiency for this thermal incinerator. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.1.7 Parametric Monitoring

(a) A continuous temperature monitoring system shall be calibrated, maintained, and operated on the recuperative thermal oxidizer for measuring operating temperature when the polystyrene foam repelletizing line is in operation when venting to the atmosphere. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

The instrument used for determining the minimum operating temperature shall comply with Section C -Temperature Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(b) The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. This pressure or amperage shall be maintained with the range as established in the most recent compliant stack test.

(c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

To document compliance with Conditions D.1.1 and D.1.7, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the usage of the blowing agent limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.7.

(1) The amount and VOC content of each material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) A log of the dates of use;

(3) The total usage of the blowing agent for each month;

(4) The weight of VOCs emitted for each compliance period;

(5) The continuous temperature records for the catalytic incinerator when the polystyrene foam repelletizing line is in operation when venting to the atmosphere and the temperature used to demonstrate compliance during the most recent compliance stack test; and

(6) Weekly records of the duct pressure or fan amperage.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
(a) Mold machines, identified as M-1, molding a maximum of 833 pounds per hour of resin injected with pentane, and exhausting to the interior of the building,
(b) Pre-Expansion Room, identified as the Pre-Expansion Room, expanding a maximum of 833 pounds per hour of resin injected with pentane, utilizing a boiler to control VOC emissions, exhausting to S-1, and consisting of:
(1) Material Preparation,
(2) Pre-Expander, identified as PE-1,
(3) Pre-Puff, identified as PP-1, and
(4) One (1) natural gas fired boiler with a rated heat input of 20.9 mmBtu per hour.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

That pursuant to Significant Source Modification 143-11382-00016, issued on February 10, 2000, and 326 IAC 8-1-6, the Best Available Control Technology (BACT), the boiler on the Pre-Expansion Room shall be in operation at all times that the Pre-Expansion Room is in operation. When operating, the boiler on the Pre-Expansion Room shall maintain a minimum operating temperatures of 1,400° F, or a temperature as determined in compliance tests in order to maintain at least 95% capture efficiency and a 95% destruction efficiency through the utilization of a boiler. These efficiencies are equivalent to VOC emissions from the Foam Cup Line (including M-1 and the Pre-Expansion Room) of less than 64.36 tons per twelve (12) consecutive month period for the maximum blowing agent usage of 182 tons per twelve (12) consecutive month period (see page 4 of 6 of TSD Appendix A). Compliance tests were completed on November 16, 2000 and resulted in a minimum operating temperature of 1,400° F. The source shall meet the following:

(1) The usage of the blowing agent, delivered to the Foam Cup Line, shall be limited to 182 tons per 12 consecutive month period. The material usage limit is equivalent to 64.36 tons of VOC emissions per 12 consecutive month period. During the first 12 months of operation, the usage of the blowing agent shall be limited such that the total amount of blowing agent used divided by the accumulated months of operation shall not exceed the limits specified.

(2) The boiler controlling VOC emissions from the Pre-Expansion Room shall be in operation at all times that the Pre-Expansion Room is in operation; and

(3) no add-on controls for the Mold Machines, identified as M-1.

Operation at or above this minimum temperature ensures compliance with the BACT requirements of 326 IAC 8-1-6.

D.2.2 Particulate Emissions Limitations for Sources of Indirect Heating

Pursuant to 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating), the PM emissions from the Foam Cup Line natural gas fired boiler has the following conditions:

Pursuant to 326 IAC 6-2-2, the PM emissions from the Foam Cup Line natural gas fired boiler, rated at 20.9 mmBtu per hour, shall be limited to 0.49 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = 0.87 / Q^{0.16}$$

where Pt is PM pounds per MMBTU and Q is the source MMBtu per hour heat input.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.2.4 Boiler Operating Temperature

(a) The boiler controlling VOC emissions from the Pre-Expansion Room shall operate at all times that the process is in operation. When operating, the boiler controlling VOC emissions from the Pre-Expansion Room shall maintain a minimum operating temperature of 1,400 ^{0}F and minimum operating fan amperage of 12.0 amps during operation, as approved by IDEM. The temperature correlates to a 95% capture efficiency and a 95% destruction efficiency based on the stack capture and destruction efficiency test.

(b) When operating the boiler controlling VOC emissions from the Pre-Expansion Room to achieve compliance with 326 IAC 8-1-6, the boiler controlling VOC emissions from the Pre-Expansion Room shall maintain a minimum 95% capture efficiency and a 95% destruction efficiency. These efficiencies and the use of the boiler controlling VOC emissions from the Pre-Expansion Room are required by the Best Available Control Technology (BACT) for the Pre-Expansion Room.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

To demonstrate compliance with the minimum 95% capture efficiency and a 95% destruction efficiency required by condition D.2.1, the Permittee performed VOC testing on November 16, 2000, utilizing Method 25 or other methods as approved by the Commissioner, to determine proper operating parameters for the thermal oxidizer, including minimum operating temperatures and fan amperage that will achieve 95% capture efficiency and a 95% destruction efficiency for this boiler. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.2.6 Parametric Monitoring

(a) A continuous temperature monitoring system shall be calibrated, maintained, and operated on the boiler controlling VOC emissions from the Pre-Expansion Room for measuring operating temperature when the Pre-Expansion Room is in operation when venting to the atmosphere. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

The instrument used for determining the minimum operating temperature shall comply with Section C -Temperature Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(b) The duct pressure or fan amperage shall be observed at least once per week when the boiler controlling VOC emissions from the Pre-Expansion Room is in operation. This pressure or amperage shall be maintained with the range as established in the most recent compliant stack test.

(c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.7 Fuel Type and Usage

Pursuant to 326 IAC 12, NSPS (40 CFR 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units), the monthly amount and type of each fuel burned on the one (1) Foam Cup Line natural gas fired boiler shall be measured.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1 and D.2.6, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the usage of the blowing agent limits and/or the VOC emission limits established in Conditions D.2.1 and D.2.6.

(1) The amount and VOC content of each material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) A log of the dates of use;

(3) The total usage of the blowing agent for each month;

(4) The weight of VOCs emitted for each compliance period;

(5) The continuous temperature records for the catalytic incinerator when the Pre-Expansion Room is in operation when venting to the atmosphere and the temperature used to demonstrate compliance during the most recent compliance stack test; and

(6) Weekly records of the duct pressure or fan amperage.

(b) To document compliance with Condition D.2.7, the Permittee shall maintain records of monthly amount and type of fuel burned.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6; [326 IAC 8-3-2] [326 IAC 8-3-5]
(b) Paved and unpaved roads and parking lots with public access; [326 IAC 6-4 and 326 IAC 6-5]
(c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blating; pneumatic conveying and woodworking operations;[326 IAC 6-3] and
(d) Other activities or categories of activities with emissions equal to or less than insignificant thresholds:
    (1) One (1) 30,000 gallons storage tank, constructed on December 1, 1998, containing the blowing agents (confidential information). [326 IAC 12][40 CFR 60.110, Subpart Kb]
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 General Provisions Relating to Standards of Performance for New Stationary Sources [326 IAC 12-1][40 CFR 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated as 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR 60, Subpart Kb.

D.3.2 Volatile Organic Liquid Storage Vessel [326 IAC 12][40 CFR 60.110, Subpart Kb]

Pursuant to 40 CFR Part 60.110b, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels), the one (1) thirty-thousand 30,000 gallon storage tank for the blowing agent (confidential information), with a design capacity of greater than 75 cubic meters, but less than 151 cubic meters and a maximum true vapor pressure of less than 15.0 kPa shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.4 Volatile Organic Compounds (VOC)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.3.5 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the grinding and machining operations including the following: deburring; buffing; polishing; abrasive blating; pneumatic conveying, and woodworking operations shall not exceed allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

Compliance Determination Requirements

D.3.6 Particulate Matter (PM)

In order to comply with D.3.5 the control devices for PM control shall be in operation and control emissions from the grinding and machining operations at all times that the grinding and machining operations are in operation.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.7 Record Keeping Requirements [326 IAC 12]

(a) To document compliance with Condition D.3.2, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken daily and shall be complete and sufficient to establish compliance with the monitoring requirements established in Condition D.3.2.

(1) The owner or operator of each vessel subject to this rule shall keep all records for the life of the vessel.

(2) The owner or operator of the one (1) thirty-thousand 30,000 gallon storage tank for the blowing agent (confidential information) shall maintain a record and submit to the department a report containing the following information for the vessel:

(A) The vessel identification number,

(B) The vessel dimensions, and

(C) The vessel capacity.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Genpak, LLC
Source Address: 845 South Elm Street, Scottsburg, Indiana, 47170
Mailing Address: 845 South Elm Street, Scottsburg, Indiana, 47170
Part 70 Permit No.: T143-11375-00016

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Genpak, LLC
Source Address: 845 South Elm Street, Scottsburg, Indiana, 47170
Mailing Address: 845 South Elm Street, Scottsburg, Indiana, 47170
Part 70 Permit No.: T143-11375-00016

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)
- C The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Genpak, LLC
Source Address: 845 South Elm Street, Scottsburg, Indiana, 47170
Mailing Address: 845 South Elm Street, Scottsburg, Indiana, 47170
Part 70 Permit No.: T143-11375-00016

9 Natural Gas Only **9** Alternate Fuel burned From:_____ To:_____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Signature:
Printed Name:
Title/Position:
Phone:
Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Genpak, LLC
Source Address: 845 South Elm Street, Scottsburg, Indiana, 47170
Mailing Address: 845 South Elm Street, Scottsburg, Indiana, 47170
Part 70 Permit No.: T143-11375-00016
Facility: Three (3) polystyrene foam extrusion operation (EPS-1, EPS-2 and EPS-3)
Parameter: Volatile Organic Compounds (VOC)
Limit: That usage of VOC, delivered to the polystyrene foam extrusion operation (including EPS-1, EPS-2 and EPS-3) shall be limited to 906.66 tons per 12 month consecutive period. This is equivalent to VOC emissions of 170.43 tons per 12 month consecutive period from the polystyrene foam extrusion operation (including EPS-1, EPS-2 and EPS-3). During the first 12 months of operation, VOC usage shall be limited such that the total VOC used divided by accumulated months of operation shall not exceed the limits specified.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Genpak, LLC
Source Address: 845 South Elm Street, Scottsburg, Indiana, 47170
Mailing Address: 845 South Elm Street, Scottsburg, Indiana, 47170
Part 70 Permit No.: T143-11375-00016
Facility: Foam Cup Line
Parameter: Volatile Organic Compounds (VOC)
Limit: That the usage of the blowing agent, delivered to the Foam Cup Line, shall be limited to 182 tons per 12 month consecutive period. This will limit the potential to emit VOC to 64.36 tons per 12 month consecutive period. During the first 12 months of operation, the usage of the blowing agent shall be limited such that the total amount of blowing agent used divided by the accumulated months of operation shall not exceed the limits specified.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Genpak, LLC
Source Address: 845 South Elm Street, Scottsburg, Indiana, 47170
Mailing Address: 845 South Elm Street, Scottsburg, Indiana, 47170
Part 70 Permit No.: T143-11375-00016

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ______________________________

Title/Position: ______________________________

Date: ______________________________

Phone: ______________________________

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name:	Genpak, LLC
Source Location:	845 South Elm Street, Scottsburg, Indiana, 47170
County:	Scott
SIC Code:	3089
Operation Permit No.:	T143-11375-00016
Permit Reviewer:	Linda Quigley/EVP

On August 18, 2001, the Office of Air Quality (OAQ) had a notice published in The Chronicle/Scott County Journal, Scott County, Indiana, stating that Genpak, LLC had applied for a Part 70 operating permit to operate a stationary polystyrene foam extrusion operation. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On September 20, 2001, Genpak, LLC submitted comments on the proposed Part 70 operating permit. Additional comments were received on October 24, 2001. The summary of the comments and corresponding responses is as follows:

Comment #1

Section A.2, Emission Units and Pollution Control Equipment Summary and Condition D.2: The descriptions of equipment found in these sections should be changed as follows (bold language should be added, text with a line through it should be removed).

One (1) polystyrene foam scrap regrinder, with a maximum capacity of ~~262~~ **1266** pounds per hour, using fabric filters as control.

(f) Mold machines, identified as M-1, ~~extruding~~ **molding** a maximum of 833 pounds per hour of resin injected with pentane, and exhausting to the interior of the building, and

(g) Pre-Expansion Room, identified as the Pre-Expansion Room, ~~extruding~~ **expanding** a maximum of 833 pounds per hour of resin injected with pentane, utilizing a boiler to control VOC emissions, exhausting to S-1, and consisting of:

The change in regrinder throughput will require recalculation of particulate emissions as shown in the Technical Support Document. The recalculated emissions will not result in a change in regulatory applicability.

We would like to note that, regarding the mold machine revisions, the current language in the draft permit is not the same as that used in the final permit for the Significant Modification in which these units were added.

Response #1

The maximum capacity of the polystyrene foam scrap regrinder has been corrected to 1266 pounds per hour in sections A.2 and D.1. The compliance calculations for PM emissions pursuant to 326 IAC 6-3-2 (Process Operations) have been added as Condition D.1.2 for the polystyrene foam scrap regrind operation. Descriptive text has been changed in sections A.2 and D.2 for the Mold machines, identified as M-1, and the Pre-Expansion Room, identified as the Pre-Expansion Room.

Note: Comment # 8 refers to the removal of the CPET line, therefore Process Operation calculations have been done for the polystyrene foam scrap regrind operation only.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Three (3) polystyrene foam tandem extruders, identified as EPS-1, EPS-2 and EPS-3, each extruding a maximum of 1,400 pounds per hour polystyrene, utilizing a Recuperative Thermal Oxidizer as control and exhausting through INCIN-1;
(b) One (1) Recuperative Thermal Oxidizer with a rated heat input of 1.0 million British thermal units (mmBtu) per hour, and exhausting through INCIN-1. This unit will control VOC emissions of the existing foam extrusion operation;
(c) One (1) CPET foam tandem extruder, identified as ECPET-1, with a maximum capacity of 900 pounds per hour;
(d) One (1) polystyrene foam scrap regrinder, with a maximum capacity of ~~262~~ **1266** pounds per hour, using fabric filters as control;
(e) One (1) CPET foam scrap regrinder, with a maximum capacity of 315 pounds per hour, using fabric filters as control;
(f) Mold machines, identified as M-1, ~~extruding~~ **molding** a maximum of 833 pounds per hour of resin injected with pentane, and exhausting to the interior of the building,
(g) Pre-Expansion Room, identified as the Pre-Expansion Room, ~~extruding~~ **expanding** a maximum of 833 pounds per hour of resin injected with pentane, utilizing a boiler to control VOC emissions, exhausting to S-1, and consisting of:
    (1) Material Preparation,
    (2) Pre-Expander, identified as PE-1,
    (3) Pre-Puff, identified as PP-1, and
    (4) One (1) natural gas fired boiler with a rated heat input of 20.9 mmBtu per hour.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
(a) Three (3) polystyrene foam tandem extruders, identified as EPS-1, EPS-2 and EPS-3, each extruding a maximum of 1,400 pounds per hour polystyrene, utilizing a Recuperative Thermal Oxidizer as control and exhausting through INCIN-1;
(b) One (1) Recuperative Thermal Oxidizer with a rated heat input of 1.0 million British thermal units (mmBtu) per hour, and exhausting through INCIN-1. This unit will control VOC emissions of the existing foam extrusion operation;
(c) One (1) CPET foam tandem extruder, identified as ECPET-1, with a maximum capacity of 900 pounds per hour;
(d) One (1) polystyrene foam scrap regrinder, with a maximum capacity of ~~262~~ **1266** pounds per hour, using fabric filters as control; and
(e) One (1) CPET foam scrap regrinder, with a maximum capacity of 315 pounds per hour, using fabric filters as control.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to Significant Source Modification 143-12416-00016, issued on December 05, 2000, and 326 IAC 8-1-6, the Best Available Control Technology (BACT) for the polystyrene foam extrusion operation and CPET foam tandem extruder (including EPS-1, EPS-2, EPS-3 and ECPET-1) has been determined to be VOC emission control by a recuperative thermal oxidizer controlling exhaust from the repelletizer for the polystyrene foam extrusion operation (including EPS-1, EPS-2 and EPS-3). The BACT requires a 85% capture efficiency and a 95% destruction efficiency through the utilization of a RTO, which is equivalent to VOC emissions from the polystyrene foam extrusion operation and CPET foam tandem extruder of less than 179.91 tons per twelve (12) consecutive month period. The source shall meet the following:

(a) The recuperative thermal oxidizer shall be used at all times that the polystyrene foam repelletizing process is in operation.

(b) That usage of VOC, delivered to the polystyrene foam extrusion operation (including EPS-1, EPS-2 and EPS-3) shall be limited to 551.88 tons per 12 month consecutive period. This is equivalent to VOC emissions of 179.91 tons per 12 month consecutive period from the polystyrene foam extrusion operation and CPET foam tandem extruder (including EPS-1, EPS-2, EPS-3 and ECPET-1). During the first 12 months of operation, VOC usage shall be limited such that the total VOC used divided by accumulated months of operation shall not exceed the limits specified.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the polystyrene foam scrap regrind operation shall not exceed 3.02 pounds per hour when operating at a process weight rate of 1266 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ **where E = rate of emission in pounds per hour;**

P = process weight rate in tons per hour

~~D.1.2~~ **D.1.3** Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Particulate Matter (PM)

In order to comply with Condition D.1.2, the fabric filters for PM control shall be in operation and control emissions from the polystyrene foam scrap regrind operation at all times that this facility is in operation.

~~D.1.3~~ **D.1.5** Recuperative Thermal Oxidizer

(a) The recuperative thermal oxidizer shall operate at all times that the process is in operation. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1,400 ^{0}F and minimum operating fan amperage of 7.2 amps during operation, as approved by IDEM. The temperature correlates to an 85% capture efficiency and a 95% destruction efficiency based on the stack capture and destruction efficiency test.

(b) When operating the thermal oxidizer to achieve compliance with 326 IAC 8-1-6, the thermal oxidizer shall maintain a minimum 85% capture efficiency and a 95% destruction efficiency. These efficiencies and the use of the thermal oxidizer are required by the Best Available Control Technology (BACT) for the polystyrene foam extrusion operation (including EPS-1, EPS-2 and EPS-3).

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

~~D.1.4~~ **D.1.6** Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

To demonstrate compliance with the minimum 85% capture efficiency and a 95% destruction efficiency required by condition D.1.1, the Permittee performed VOC testing on October 14, 1999, utilizing Method 25 or other methods as approved by the Commissioner, to determine proper operating parameters for the thermal oxidizer, including minimum operating temperature and fan amperage that will achieve 85% capture efficiency and a 95% destruction efficiency for this thermal incinerator. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

~~D.1.5~~ **D.1.7** Parametric Monitoring

(a) A continuous temperature monitoring system shall be calibrated, maintained, and operated on the recuperative thermal oxidizer for measuring operating temperature when the polystyrene foam repelletizing line is in operation when venting to the atmosphere. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

The instrument used for determining the minimum operating temperature shall comply with Section C -Temperature Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

(b) The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. This pressure or amperage shall be maintained with the range as established in the most recent compliant stack test.

(c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

~~D.1.6~~ **D.1.8** Record Keeping Requirements

To document compliance with Conditions D.1.1 and ~~D.1.5~~ **D.1.7**, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the usage of the blowing agent limits and/or the VOC emission limits established in Conditions D.1.1 and ~~D.1.5~~ **D.1.7**.

(1) The amount and VOC content of each material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) A log of the dates of use;

(3) The total usage of the blowing agent for each month;

(4) The weight of VOCs emitted for each compliance period;

(5) The continuous temperature records for the catalytic incinerator when the polystyrene foam repelletizing line is in operation when venting to the atmosphere and the temperature used to demonstrate compliance during the most recent compliance stack test; and

(6) Weekly records of the duct pressure or fan amperage.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

~~D.1.7~~ **D.1.9** Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
(a) Mold machines, identified as M-1, ~~extruding~~ **molding** a maximum of 833 pounds per hour of resin injected with pentane, and exhausting to the interior of the building,
(b) Pre-Expansion Room, identified as the Pre-Expansion Room, ~~extruding~~ **expanding** a maximum of 833 pounds per hour of resin injected with pentane, utilizing a boiler to control VOC emissions, exhausting to S-1, and consisting of:
(1) Material Preparation,
(2) Pre-Expander, identified as PE-1,
(3) Pre-Puff, identified as PP-1, and
(4) One (1) natural gas fired boiler with a rated heat input of 20.9 mmBtu per hour.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Comment #2

Section A.3. Specifically Regulated Insignificant Activities: Item (b) should be deleted. Genpak does not use the equipment described in any manufacturing activities. This type of equipment is used as part of the facility's maintenance activities.

Response #2

Based on the fact that the source does not use the equipment described in any manufacturing activities as described, item (b) in Sections A.3 and D.3 will be removed and Condition D.3.5 will be modified to reflect this fact. Subsequent Section A.3 and D.3 items will be renumbered.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6; [326 IAC 8-3-2] [326 IAC 8-3-5]

~~(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;[326 IAC 6-3]~~

~~(c)~~ **(b)** Paved and unpaved roads and parking lots with public access; [326 IAC 6-4 and 326 IAC 6-5]

~~(d)~~ **(c)** Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blating; pneumatic conveying and woodworking operations;[326 IAC 6-3] and

~~(e)~~ **(d)** Other activities or categories of activities with emissions equal to or less than insignificant thresholds:

(1) One (1) 30,000 gallons storage tank, constructed on December 1, 1998, containing the blowing agents (confidential information) for the ECPET-1 extruder. [326 IAC 12][40 CFR 60.110, Subpart Kb]

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6; [326 IAC 8-3-2] [326 IAC 8-3-5]

~~(b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;[326 IAC 6-3]~~

~~(c)~~ **(b)** Paved and unpaved roads and parking lots with public access; [326 IAC 6-4 and 326 IAC 6-5]

~~(d)~~ **(c)** Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blating; pneumatic conveying and woodworking operations;[326 IAC 6-3] and

~~(e)~~ **(d)** Other activities or categories of activities with emissions equal to or less than insignificant thresholds:

(1) One (1) 30,000 gallons storage tank, constructed on December 1, 1998, containing the blowing agents (confidential information) for the ECPET-1 extruder. [326 IAC 12][40 CFR 60.110, Subpart Kb]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.3.5 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the grinding and machining operations including the following: deburring; buffing; polishing; abrasive blating; pneumatic conveying, **and** woodworking operations, ~~brazing equipment, cutting torches, soldering equipment and welding equipment~~ shall not exceed allowable PM emission rate based on the following equation:

Comment #3

Section D.1.1. Volatile Organic Compounds (VOC): This D Section of the permit encompasses three EPS lines and one CPET line. The VOC usage and VOC emissions should reflect the corresponding quantities. More specifically, in the first paragraph of D.1.1, 179.91 tons of VOC emissions should be changed to 208.5 tons. Similarly, D.1.1 (b) should replace 551.88 tons of VOC usage with 993.4 tons of VOC usage and 179.91 tons of VOC emissions with 208.5 tons of VOC emissions.

A copy of the spreadsheet submitted with the application for Significant Modification 143-12416-00016 is included in this submittal. This spreadsheet provides the basis for the numerical changes requested above.

Response #3

Note: Comment # 8 refers to the removal of the CPET line, therefore VOC emissions and usage rates have been adjusted reflecting the latest changes.

Condition D.1.1 from Significant Source Modification 143-12416-00016, issued on December 05, 2000, states that "pursuant to 326 IAC 8-1-6, the Best Available Control Technology (BACT) for the stationary polystyrene foam extrusion operation has been determined to be VOC emission control by a recuperative thermal oxidizer controlling exhaust from the repelletizer for three (3) polystyrene extrusion lines, controlling 114 tons of VOC emissions per year..." The BACT was performed on controlling the three extrusion lines only and CPET emissions should not be included in the VOC emissions allowed under 326 IAC 8-1-6.

Pursuant to 143-12416-00016, the usage of VOC, delivered to the three (3) polystyrene extrusion lines shall be limited to 906.66 tons per twelve (12) month consecutive period. This is equivalent to VOC emissions of 170.43 tons per twelve (12) month consecutive period.

The following changes have been made to Condition D.1.1.

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Pursuant to Significant Source Modification 143-12416-00016, issued on December 5, 2000, and 326 IAC 8-1-6, the Best Available Control Technology (BACT) for the polystyrene foam extrusion operation ~~and CPET foam tandem extruder~~ (including EPS-1, EPS-2, **and** EPS-3~~ and ECPET-1~~) has been determined to be VOC emission control by a recuperative thermal oxidizer controlling exhaust from the repelletizer for the polystyrene foam extrusion operation (including EPS-1, EPS-2 and EPS-3). The BACT requires a 85% capture efficiency and a 95% destruction efficiency through the utilization of a RTO, which is equivalent to VOC emissions from the polystyrene foam extrusion operation ~~and CPET foam tandem extruder~~ of less than ~~179.91~~ **170.43** tons per twelve (12) consecutive month period. The source shall meet the following:

(a) The recuperative thermal oxidizer shall be used at all times that the polystyrene foam repelletizing process is in operation.

(b) That usage of VOC, delivered to the polystyrene foam extrusion operation (including EPS-1, EPS-2 and EPS-3) shall be limited to ~~551.88~~ **906.66** tons per 12 month consecutive period. This is equivalent to VOC emissions of ~~179.91~~ **170.43** tons per 12 month consecutive period from the polystyrene foam extrusion operation~~ and CPET foam tandem extruder~~ (including EPS-1, EPS-2, **and** EPS-3 ~~and ECPET-1~~). During the first 12 months of operation, VOC usage shall be limited such that the total VOC used divided by accumulated months of operation shall not exceed the limits specified.

Comment #4

Section D.1.3. Recuperative Thermal Oxidizer: The minimum fan amperage should change from 7.2 to 6.6. This change is based on operational knowledge obtained since the time of application submittal, stack testing, and application review by the agency.

Response #4

The minimum fan amperage listed in Condition D.1.3 (now D.1.5) has been changed to 6.6 amps.

D.1.5 Recuperative Thermal Oxidizer

(a) The recuperative thermal oxidizer shall operate at all times that the process is in operation. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1,400 ^{0}F and minimum operating fan amperage of ~~7.2~~ **6.6** amps during operation, as approved by IDEM. The temperature correlates to an 85% capture efficiency and a 95% destruction efficiency based on the stack capture and destruction efficiency test.

(b) When operating the thermal oxidizer to achieve compliance with 326 IAC 8-1-6, the thermal oxidizer shall maintain a minimum 85% capture efficiency and a 95% destruction efficiency. These efficiencies and the use of the thermal oxidizer are required by the Best Available Control Technology (BACT) for the polystyrene foam extrusion operation (including EPS-1, EPS-2 and EPS-3).

Comment #5

Section D.2.1. Volatile Organic Compounds: We request that the following change in the first paragraph. "These efficiencies are equivalent to VOC emissions from the Foam Cup Line (including M-1 and the Pre-Expansion Room) of less than 64.36 tons per twelve (12) consecutive month period for the maximum ~~raw material~~ **blowing agent** usage of ~~3,500~~ **182** tons per twelve (12) consecutive month period (see page 4 of 6 of TSD Appendix A)."

We also request the following clarification in D.2.1 (a). "Which is equivalent to 64.36 tons of VOC emissions per 12 month consecutive period.

Response #5

Because the blowing agent in the raw material is the only material containing VOC, IDEM OAQ agrees that Condition D.2.1 should be changed to reflect the maximum usage of the blowing agent. Condition D.2.1(1) has also been changed to clarify VOC *emissions*.

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

That pursuant to Significant Source Modification 143-11382-00016, issued on February 10, 2000, and 326 IAC 8-1-6, the Best Available Control Technology (BACT), the boiler on the Pre-Expansion Room shall be in operation at all times that the Pre-Expansion Room is in operation. When operating, the boiler on the Pre-Expansion Room shall maintain a minimum operating temperatures of 1,400° F, or a temperature as determined in compliance tests in order to maintain at least 95% capture efficiency and a 95% destruction efficiency through the utilization of a boiler. These efficiencies are equivalent to VOC emissions from the Foam Cup Line (including M-1 and the Pre-Expansion Room) of less than 64.36 tons per twelve (12) consecutive month period for the maximum ~~raw material~~ **blowing agent** usage of ~~3,500~~ **182** tons per twelve (12) consecutive month period (see page 4 of 6 of TSD Appendix A). Compliance tests were completed on November 16, 2000 and resulted in a minimum operating temperature of 1,400° F. The source shall meet the following:

(1) The usage of the blowing agent, delivered to the Foam Cup Line, shall be limited to 182 tons per 12 consecutive month period. ~~Which~~ **The material usage limit** is equivalent to 64.36 tons of VOC **emissions** per 12 consecutive month period. During the first 12 months of operation, the usage of the blowing agent shall be limited such that the total amount of blowing agent used divided by the accumulated months of operation shall not exceed the limits specified.

(2) The boiler controlling VOC emissions from the Pre-Expansion Room shall be in operation at all times that the Pre-Expansion Room is in operation; and

(3) no add-on controls for the Mold Machines, identified as M-1.

Operation at or above this minimum temperature ensures compliance with the BACT requirements of 326 IAC 8-1-6.

Comment #6

Section D.2.4, Boiler Operation Temperature: The minimum fan amperage should change from 13.5 to 12.0. This change is based on operational knowledge obtained since the time of application submittal, stack testing, and application review by the agency.

Response #6

The minimum fan amperage listed in Condition D.2.4 has been changed 12.0 amps.

D.2.4 Boiler Operating Temperature

(a) The boiler controlling VOC emissions from the Pre-Expansion Room shall operate at all times that the process is in operation. When operating, the boiler controlling VOC emissions from the Pre-Expansion Room shall maintain a minimum operating temperature of 1,400 ^{0}F and minimum operating fan amperage of ~~13.5~~ **12.0** amps during operation, as approved by IDEM. The temperature correlates to a 95% capture efficiency and a 95% destruction efficiency based on the stack capture and destruction efficiency test.

(b) When operating the boiler controlling VOC emissions from the Pre-Expansion Room to achieve compliance with 326 IAC 8-1-6, the boiler controlling VOC emissions from the Pre-Expansion Room shall maintain a minimum 95% capture efficiency and a 95% destruction efficiency. These efficiencies and the use of the boiler controlling VOC emissions from the Pre-Expansion Room are required by the Best Available Control Technology (BACT) for the Pre-Expansion Room.

Comment #7

Section D.3, Insignificant Activities: Item (b) should be deleted as discussed in Section A.3 above.

Response #7

In Section D.3, item (b) has been deleted and corresponding descriptions in Condition D.3.5 have been deleted. See Response #2 above.

Comment #8

Technical Support Document: The spreadsheets in Appendix A pages 1 through 3 do not reflect the Significant Modification 143-12416-00016. The enclosed spreadsheet provides the VOC calculations that should be used in Appendix A. In addition to these revisions, page 3 of Appendix A should reflect the regrind maximum rate of 1266 pounds per hour. As a point of clarification, the regrind rate in the EPS VOC calculations sheet and the regrind rate in the EPS PM sheet reflect different pieces of equipment. Therefore, the rates will not be the same. One piece of equipment is a VOC source and a separate piece of equipment is a PM source.

In addition:

The most recent permit issued to Genpak includes an emission unit referred to as "CPET". This emission unit is no longer operating at the facility. The equipment has been partially dismantled and portions have been removed. There are no plans to operate this unit in the future. The associated storage tank remains but is not used. Genpak requests that reference to this emission unit and the associated potential emissions be removed from the permit. More specifically, we believe this would require revisions at Sections A.2.(c), A.2.(e), D.1 Facility Description (e), and D.1.1. With regard to potential to emit, a revised emissions spreadsheet is enclosed. The resulting potential to emit for the entire facility is 234.8. Therefore, the source will remain a minor source with respect to PSD requirements.

Response #8

The TSD Appendix A, pages 1 through 3, have been revised to reflect the Significant Modification 143-12416-00016 and to reflect the correct regrind maximum rate of 1266 pounds per hour. Please see attached TSD Addendum Appendix A, pages 1 through 3. References to the CPET emission unit have been removed from Sections A and D of the permit and the Potential to Emit After Issuance table has been revised as follows:

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Natural Gas Combustion	0.17	0.70	0.05	0.50	7.69	9.15	0.17/ 0.16 Hexane
EPS-1	~~2.87~~ **13.86**	~~2.87~~ **13.86**	0.00	~~45.63~~ **56.81**	0.00	0.00	0.00
EPS-2	~~2.87~~ **13.86**	~~2.87~~ **13.86**	0.00	~~45.63~~ **56.81**	0.00	0.00	0.00
EPS-3	~~2.87~~ **13.86**	~~2.87~~ **13.86**	0.00	~~45.63~~ **56.81**	0.00	0.00	0.00
~~ECPET-1~~	~~3.45~~	~~3.45~~	~~0.00~~	~~43.02~~	~~0.00~~	~~0.00~~	~~0.00~~

Pre-Expansion Room Emissions	0.00	0.00	0.00	9.76	0.00	0.00	0.00
Pentane Emissions (Mold Machines)	0.00	0.00	0.00	54.60	0.00	0.00	0.00
Total Emissions	~~12.23~~ **41.75**	~~12.76~~ **42.28**	0.05	~~244.77~~ **235.29**	7.69	9.15	0.17/ 0.16 Hexane

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Three (3) polystyrene foam tandem extruders, identified as EPS-1, EPS-2 and EPS-3, each extruding a maximum of 1,400 pounds per hour polystyrene, utilizing a Recuperative Thermal Oxidizer as control and exhausting through INCIN-1;

(b) One (1) Recuperative Thermal Oxidizer with a rated heat input of 1.0 million British thermal units (mmBtu) per hour, and exhausting through INCIN-1. This unit will control VOC emissions of the existing foam extrusion operation;

~~(c) One (1) CPET foam tandem extruder, identified as ECPET-1, with a maximum capacity of 900 pounds per hour;~~

~~(d)~~ **(c)** One (1) polystyrene foam scrap regrinder, with a maximum capacity of 1266 pounds per hour, using fabric filters as control;

~~(e) One (1) CPET foam scrap regrinder, with a maximum capacity of 315 pounds per hour, using fabric filters as control;~~

~~(f)~~ **(d)** Mold machines, identified as M-1, molding a maximum of 833 pounds per hour of resin injected with pentane, and exhausting to the interior of the building,

~~(g)~~ **(e)** Pre-Expansion Room, identified as the Pre-Expansion Room, expanding a maximum of 833 pounds per hour of resin injected with pentane, utilizing a boiler to control VOC emissions, exhausting to S-1, and consisting of:

(1) Material Preparation,
(2) Pre-Expander, identified as PE-1,
(3) Pre-Puff, identified as PP-1, and
(4) One (1) natural gas fired boiler with a rated heat input of 20.9 mmBtu per hour.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) Three (3) polystyrene foam tandem extruders, identified as EPS-1, EPS-2 and EPS-3, each extruding a maximum of 1,400 pounds per hour polystyrene, utilizing a Recuperative Thermal Oxidizer as control and exhausting through INCIN-1;

(b) One (1) Recuperative Thermal Oxidizer with a rated heat input of 1.0 million British thermal units (mmBtu) per hour, and exhausting through INCIN-1. This unit will control VOC emissions of the existing foam extrusion operation;

~~(c) One (1) CPET foam tandem extruder, identified as ECPET-1, with a maximum capacity of 900 pounds per hour;~~

~~(d)~~ **(c)** One (1) polystyrene foam scrap regrinder, with a maximum capacity of 1266 pounds per hour, using fabric filters as control**.** ~~and~~

~~(e) One (1) CPET foam scrap regrinder, with a maximum capacity of 315 pounds per hour, using fabric filters as control.~~

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.4 Particulate Matter (PM)

Pursuant to Operation Permit CP-143-9047-00016, issued on April 3, 1998, and in order to comply with Condition D.1.2, the fabric filters for PM control shall be in operation and control emissions from the polystyrene foam scrap regrind operation ~~and the CPET foam scrap regrind operation~~ at all times that these facilities are in operation.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6; [326 IAC 8-3-2] [326 IAC 8-3-5]

(b) Paved and unpaved roads and parking lots with public access; [326 IAC 6-4 and 326 IAC 6-5]

(c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blating; pneumatic conveying and woodworking operations;[326 IAC 6-3] and

(d) Other activities or categories of activities with emissions equal to or less than insignificant thresholds:

(1) One (1) 30,000 gallons storage tank, constructed on December 1, 1998, containing the blowing agents (confidential information) ~~for the ECPET-1 extruder~~. [326 IAC 12][40 CFR 60.110, Subpart Kb]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.2 Volatile Organic Liquid Storage Vessel [326 IAC 12][40 CFR 60.110, Subpart Kb]

Pursuant to 40 CFR Part 60.110b, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels), the one (1) thirty-thousand 30,000 gallon storage tank for the blowing agent (confidential information) ~~for the ECPET-1 extruder~~, with a design capacity of greater than 75 cubic meters, but less than 151 cubic meters and a maximum true vapor pressure of less than 15.0 kPa shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.

D.3.7 Record Keeping Requirements [326 IAC 12]

(a) To document compliance with Condition D.3.2, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken daily and shall be complete and sufficient to establish compliance with the monitoring requirements established in Condition D.3.2.

(1) The owner or operator of each vessel subject to this rule shall keep all records for the life of the vessel.

(2) The owner or operator of the one (1) thirty-thousand 30,000 gallon storage tank for the blowing agent (confidential information) ~~for the ECPET-1 extruder~~ shall maintain a record and submit to the department a report containing the following information for the vessel:

As a result of the removal of ECPET-1, Condition B.13(c)(4) (Permit Shield) has also been modified with the following changes:

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(c) In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determinations regarding this source:

~~(4) Condition D.1.1(b):~~

~~That usage of VOC, delivered to the three (3) polystyrene extrusion lines shall be limited to 906.66 tons per twelve (12) month consecutive period. This is equivalent to VOC emissions of 170.43 tons per twelve (12) month consecutive period. During the first 365 days of operation, VOC usage shall be limited such that the total VOC used divided by accumulated months of operation shall not exceed the limits specified.~~

~~Reason not incorporated: The BACT analysis for CP143-12416-00016 was based on the polystyrene foam extrusion operation (EPS-1, EPS-2, EPS-3) and CPET foam tandem extruder (ECPET-1). However, the equivalent VOC emissions were based on only the polystyrene foam extrusion operation (EPS-1, EPS-2, EPS-3). Condition D.1.1 has been revised to include the maximum capacity of blowing agent used when extruding polystyrene has been reduced and the 326 IAC 8-1-6 limit, which formerly included only the polystyrene foam extrusion operation (EPS-1, EPS-2, EPS-3) has been revised to include the CPET foam tandem extruder (ECPET-1) in the BACT limit.~~

Upon further review, the OAQ has decided to make the following changes to the Title V Permit. Bolded language has been added and the language with a line through it has been deleted.

Condition B.2, Permit Term has included the rule siting 326 IAC 2-1.1-9.5.

B.2 Permit Term [326 IAC 2-7-5(2)] **[326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

Condition B.8, Compliance with Permit Conditions has been revised to clarify that noncompliance with any requirement of this permit may result in an enforcement action against the permittee, an action to modify, revoke, reissue or terminate the source's permit, and/or a denial of the permittee's application to renew the permit.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit ~~except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and~~ is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) **Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.**

(c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.14 Multiple Exceedances has been deleted, because 326 IAC 2-7-5(1)(E) has been repealed.

~~B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]~~

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

B.14 Prior Permit Conditions Superseded was added to the permit to help clarify the intent of the new rule 326 IAC 2-1.1-9.5.

B.14 Prior Permit Conditions Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

The IDEM, OAQ, has revised Condition B.15 Deviations from Permit Requirements and Conditions to address concerns regarding the independent enforceability of permit conditions [see 40 CFR 70.6(a)(6)(i)]. B.15 was revised to remove language that could be considered to grant exemptions from permit requirements and to clarify reporting obligations.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit,** shall be reported according to the schedule stated in the applicable requirement and ~~do~~ **does** not need to be included in this report.

The ~~notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule. It does not include:~~

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Emergency Provisions (a)(b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation~~, except as provided in 326 IAC 2-7-16.~~

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based or~~ technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(g) ~~Operations may continue during an emergency only if the following conditions are met:~~

~~(1)~~ If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

~~(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~

~~(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~

~~(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

Condition B.13(b) Permit Shield has been removed since B.14 Prior Permit Conditions Superceded has been added to the permit, it is not necessary for this statement to be in this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~

~~(c)~~**(b)** In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determinations regarding this source:

(1) Operation Permit CP-143-9047-00016, issued on April 3, 1998

Condition D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

That pursuant to 326 IAC 8-1-6 (General Reduction Requirements), the source shall comply with the following requirements:

(A) The blowing agent used on the polystyrene extrusion line shall be limited to 181 tons per 365-day period, rolled on a daily basis. This limit is based on the assumption that the loss of blowing agent during extrusion, warehousing, and thermoforming is 8% and the loss of blowing agent during regrind is 100%. This limit is equivalent to potential to emit (PTE) VOC of 63 tons per 365-day period. This is equivalent to 14.38 pounds VOC per hour. Any change or modification to this facility shall allow for OAQ to re-open this analysis.

(B) The blowing agent used on the CPET extrusion line shall be limited to 86 tons per 365 day period, rolled on a daily basis. This limit is based on the assumption that the loss of blowing agent during extrusion, warehousing, and thermoforming is 30% and the loss of blowing agent during regrind is 80%. This limit is equivalent to potential to emit (PTE) VOC of 43 tons per 365-day period. This is equivalent to 9.81 pounds VOC per hour. Any change or modification to this facility shall allow for OAQ to re-open this analysis.

(C) If any additional extrusion lines are added to this source, even if their individual volatile organic compound (VOC) emissions are less than twenty-five (25) tons per year, or if the blowing agent is to be changed to another type (Confidential Information), a new Best Available Control Technology (BACT) analysis will be performed for all VOC emission units at the source. The BACT options for the previously permitted emission units shall be re-evaluated.

Reason not incorporated: The VOC and BACT requirements of Operation Permit CP-143-9047-00016, issued on April 3, 1998 have been superseded by the requirements of Operation Permit 143-9851-00016, issued on November 19, 1998, which requires the use of a Thermal Oxidizer as BACT.

(2) Operation Permit CP-143-9047-00016, issued on April 3, 1998

Condition D.1.2 Testing Requirements [326 IAC 2-1-3]
That pursuant to 326 IAC 2-1-3 (Construction and Operating Permit Requirements) compliance stack tests shall be performed for percentage blowing agent lost and actual volatile organic compound (VOC) emissions from the polystyrene foam extrusion line and the CPET foam extrusion line within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up. These tests shall be performed according to 326 IAC 3-2.1 (Source Sampling Procedures) using the methods specified in the rule or as approved by the Commissioner.

(A) A test protocol shall be submitted to the OAQ, Compliance Data Section, 35 days in advance of the test.
(B) The Compliance Data Section shall be notified of the actual test date at least two (2) weeks prior to the date.
(C) All test reports must be received by the Compliance Data Section within 45 days of completion of the testing.
(D) Whenever the results of the stack test performed exceed the level specified in this permit, appropriate corrective actions shall be implemented within thirty (30) days of receipt of the test results. These actions shall be implemented immediately unless notified by OAQ that they are acceptable. The Permittee shall minimize emissions while the corrective actions are being implemented.
(E) Whenever the results of the stack test performed exceed the level specified in this permit, a second test to demonstrate compliance shall be performed within 120 days. Failure of the second test to demonstrate compliance may be grounds for immediate revocation of this permit to operate the affected facility. Compliance Monitoring Requirements [326 IAC 2-7-6(1)]

Reason not incorporated: The VOC testing requirements of Operation Permit CP-143-9047-00016, issued on April 3, 1998 have been superseded by the requirements of Operation Permit 143-9851-00016, issued on November 19, 1998, which requires VOC testing of the Thermal Oxidizer.

(3) Operation Permit CP-143-9047-00016, issued on April 3, 1998

Condition D.1.3 Best Available Control Technology (BACT) Requirements [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the source shall comply with the following requirements:

(A) During off-loading of blowing agents (Confidential Information) the atmosphere in the storage vessel is vented back to the delivery tanker or rail car instead of being vented to the ambient air.

(B) All transfer piping conveying blowing agent from the storage vessel to the facility operations is double walled. Interstitial monitoring is present to detect leaks from the inner piping or flanges.

(C) All tubing in the plant is high pressure usage tested for integrity following installation.

(D) Combustible gas meters are present in the process areas to detect the presence of blowing agent (Confidential Information). If blowing agent (Confidential Information) is detected, the source will be investigated through visual or gas detection inspection. Any leaks will be repaired.

(E) During extrusion, immediately in front of the die lips is an area of unexpanded gel known as the halo. Air rings inside and outside of the sheet apply air directly to the halo to properly skin the foam, thus reducing the emission of blowing agent into the atmosphere during extrusion.

(F) Visual inspections of all tubing and equipment for possible VOC emission leaks shall be performed once per shift.

(G) Daily inspections of the two (2) foam tandem extruders shall be performed to verify that there are no possible malfunctions in the operation.

(H) All readily visible and exposed piping and tubing shall be inspected daily for any possible leaks.

(I) The combustible gas meters shall be calibrated once per month.

(J) The unexpanded gel known as the halo shall be inspected daily to verify they are operating properly.

Reason not incorporated: The VOC and BACT requirements of Operation Permit CP-143-9047-00016, issued on April 3, 1998 have been superseded by the requirements of Operation Permit 143-9851-00016, issued on November 19, 1998, which requires the use of a Thermal Oxidizer as BACT.

~~(d)~~**(c)** If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

~~(e)~~**(d)** No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

~~(f)~~**(e)** Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

~~(g)~~**(f)** This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

~~(h)~~**(g)** This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

~~(i)~~**(h)** This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

Condition C.7 has been revised so that the Permittee understands that the asbestos notification should be certified by the owner or operator and not the responsible official. Also, condition C.16 has been revised, it requires that a certification by the responsible official for the notification sent in response to non-compliance with a stack test.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(4) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

The IDEM, OAQ has restructured C.15 to clarify the contents and implementation of the compliance response plan. The language regarding the OAQ's discretion to excuse failure to perform monitoring under certain conditions has been deleted. The OAQ retains this discretion to excuse minor incidents of missing data; however, it is not necessary to state criteria regarding the exercise of that discretion in the permit. Also, in Condition C.15(c)(2) "administrative amendment" has been revised to "minor permit modification," because 326 IAC 2-7-11(a)(7) has been repealed.

C.15 Compliance ~~Monitoring~~ **Response** Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to **prepare** ~~implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~

~~(1) This condition;~~

~~(2) The Compliance Determination Requirements in Section D of this permit;~~

~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~

~~(4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~

~~(5) A~~ **a** Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. **A** CRP~~'s~~ shall be submitted to IDEM, OAQ upon request ~~and shall be subject to review and approval by IDEM, OAQ~~. The CRP shall be prepared within ninety (90) days after issuance of this permit by the **Permittee, supplemented from time to time by the Permittee,** ~~and~~ maintained on site, and ~~is~~ comprised of:

~~(A)~~**(1)** Reasonable response steps that may be implemented in the event that ~~compliance related information indicates that~~ a response step is needed pursuant to the requirements of Section D of this permit; and **an expected timeframe for taking reasonable response steps.**

~~(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:** ~~Failure to take reasonable response steps may constitute a violation of the permit.~~

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) ~~Upon investigation of a compliance monitoring excursion, the~~ **The** Permittee is ~~excused from taking~~ **not required to take any** further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment **and** ~~This shall be an excuse from taking further response steps providing that~~ prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for ~~an administrative amendment~~ **a minor permit modification** to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

~~(d)~~**(e)** ~~Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.~~ **The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

~~(e)~~**(f)** **Except as otherwise provided by a rule or provided specifically in Section D,** all monitoring **as** required in Section D shall be performed ~~at all times~~ **when** the ~~equipment~~ **emission unit** is operating, **except for time necessary to perform quality assurance and maintenance activities**. ~~If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.~~

~~(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Genpak, LLC
Source Location:	845 South Elm Street, Scottsburg, Indiana, 47170
County:	Scott
SIC Code:	3089
Operation Permit No.:	T143-11375-00016
Permit Reviewer:	Phillip Ritz/EVP

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Genpak, LLC relating to the operation of a stationary polystyrene foam extrusion operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Three (3) polystyrene foam tandem extruders, identified as EPS-1, EPS-2 and EPS-3, each extruding a maximum of 1,400 pounds per hour polystyrene, utilizing a Recuperative Thermal Oxidizer as control and exhausting through INCIN-1;

(b) One (1) Recuperative Thermal Oxidizer with a rated heat input of 1.0 million British thermal units (mmBtu) per hour, and exhausting through INCIN-1. This unit will control VOC emissions of the existing foam extrusion operation;

(c) One (1) CPET foam tandem extruder, identified as ECPET-1, with a maximum capacity of 900 pounds per hour;

(d) One (1) polystyrene foam scrap regrinder, with a maximum capacity of 262 pounds per hour, using fabric filters as control;

(e) One (1) CPET foam scrap regrinder, with a maximum capacity of 315 pounds per hour, using fabric filters as control;

(f) One (1) foam cup line, consisting of the following:

  (1) Mold machines, identified as M-1, extruding a maximum of 833 pounds per hour of resin injected with pentane, and exhausting to the interior of the building,

  (2) One (1) room for resin extrusion, identified as the Pre-Expansion Room, extruding a maximum of 833 pounds per hour of resin injected with pentane, utilizing a boiler to control VOC emissions, exhausting to S-1, and consisting of:

    (A) Material Preparation,

    (B) Pre-Expander, identified as PE-1,

    (C) Pre-Puff, identified as PP-1, and

    (D) One (1) natural gas fired boiler with a rated heat input of 20.9 mmBtu per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour;
  (1) Three (3) process dryers with combined maximum heat input capacity of 1.5 million British thermal units per hour (mmBtu/hr);
  (2) Fourteen (14) gas unit heaters with combined maximum heat input capacity of 2.0 mmBtu per hour;
  (3) Three (3) air makeup units with combined maximum heat input of 8.2 mmBtu per hour;

(b) The following VOC and HAP storage container: Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids;

(c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6; [326 IAC 8-3-2] [326 IAC 8-3-5]

(d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment;[326 IAC 6-3]

(e) Closed loop heating and cooling systems;

(f) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;

(g) Paved and unpaved roads and parking lots with public access; [326 IAC 6-4 and 326 IAC 6-5]

(h) Enclosed systems for conveying plastic raw materials and plastic finished goods;

(i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;

(j) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blating; pneumatic conveying and woodworking operations;[326 IAC 6-3] and

(h) Other activities or categories of activities with emissions equal to or less than insignificant thresholds:
  (1) One (1) 30,000 gallons storage tank, constructed on December 1, 1998, containing the blowing agents (confidential information) for the ECPET-1 extruder. [326 IAC 12][40 CFR 60.110, Subpart Kb]
  (2) One (1) 30,000 gallons storage tank, constructed on December 1, 1998, containing the blowing agents (confidential information), designed to operate in excess of 204.9 kPa and without emissions to the atmosphere.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) Operation Permit CP-143-9047-00016, issued on April 3, 1998;

(b) Operation Permit 143-9851-00016, issued on November 19, 1998;

(c) Significant Source Modification 143-11382-00016, issued on February 10, 2000;

(d) Operation Permit 143-12201-00016, issued on June 14, 2000; and

(e) Significant Source Modification 143-12416-00016, issued on December 05, 2000.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

(1) Operation Permit CP-143-9047-00016, issued on April 3, 1998

Condition D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

That pursuant to 326 IAC 8-1-6 (General Reduction Requirements), the source shall comply with the following requirements:

(a) The blowing agent used on the polystyrene extrusion line shall be limited to 181 tons per 365-day period, rolled on a daily basis. This limit is based on the assumption that the loss of blowing agent during extrusion, warehousing, and thermoforming is 8% and the loss of blowing agent during regrind is 100%. This limit is equivalent to potential to emit (PTE) VOC of 63 tons per 365-day period. This is equivalent to 14.38 pounds VOC per hour. Any change or modification to this facility shall allow for OAQ to re-open this analysis.

(b) The blowing agent used on the CPET extrusion line shall be limited to 86 tons per 365 day period, rolled on a daily basis. This limit is based on the assumption that the loss of blowing agent during extrusion, warehousing, and thermoforming is 30% and the loss of blowing agent during regrind is 80%. This limit is equivalent to potential to emit (PTE) VOC of 43 tons per 365-day period. This is equivalent to 9.81 pounds VOC per hour. Any change or modification to this facility shall allow for OAQ to re-open this analysis.

(c) If any additional extrusion lines are added to this source, even if their individual volatile organic compound (VOC) emissions are less than twenty-five (25) tons per year, or if the blowing agent is to be changed to another type (Confidential Information), a new Best Available Control Technology (BACT) analysis will be performed for all VOC emission units at the source. The BACT options for the previously permitted emission units shall be re-evaluated.

Reason not incorporated: The VOC and BACT requirements of Operation Permit CP-143-9047-00016, issued on April 3, 1998 have been superseded by the requirements of Operation Permit 143-9851-00016, issued on November 19, 1998, which requires the use of a Thermal Oxidizer as BACT.

(2) Operation Permit CP-143-9047-00016, issued on April 3, 1998

Condition D.1.2 Testing Requirements [326 IAC 2-1-3]

That pursuant to 326 IAC 2-1-3 (Construction and Operating Permit Requirements) compliance stack tests shall be performed for percentage blowing agent lost and actual volatile organic compound (VOC) emissions from the polystyrene foam extrusion line and the CPET foam extrusion line within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up. These tests shall be performed according to 326 IAC 3-2.1 (Source Sampling Procedures) using the methods specified in the rule or as approved by the Commissioner.

(a) A test protocol shall be submitted to the OAQ, Compliance Data Section, 35 days in advance of the test.

(b) The Compliance Data Section shall be notified of the actual test date at least two (2) weeks prior to the date.

(c) All test reports must be received by the Compliance Data Section within 45 days of completion of the testing.

(d) Whenever the results of the stack test performed exceed the level specified in this permit, appropriate corrective actions shall be implemented within thirty (30) days of receipt of the test results. These actions shall be implemented immediately unless notified by OAQ that they are acceptable. The Permittee shall minimize emissions while the corrective actions are being implemented.

(e) Whenever the results of the stack test performed exceed the level specified in this permit, a second test to demonstrate compliance shall be performed within 120 days. Failure of the second test to demonstrate compliance may be grounds for immediate revocation of this permit to operate the affected facility. Compliance Monitoring Requirements [326 IAC 2-7-6(1)]

Reason not incorporated: The VOC testing requirements of Operation Permit CP-143-9047-00016, issued on April 3, 1998 have been superseded by the requirements of Operation Permit 143-9851-00016, issued on November 19, 1998, which requires VOC testing of the Thermal Oxidizer.

(3) Operation Permit CP-143-9047-00016, issued on April 3, 1998

Condition D.1.3 Best Available Control Technology (BACT) Requirements [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the source shall comply with the following requirements:

(a) During off-loading of blowing agents (Confidential Information) the atmosphere in the storage vessel is vented back to the delivery tanker or rail car instead of being vented to the ambient air.

(b) All transfer piping conveying blowing agent from the storage vessel to the facility operations is double walled. Interstitial monitoring is present to detect leaks from the inner piping or flanges.

(c) All tubing in the plant is high pressure usage tested for integrity following installation.

(d) Combustible gas meters are present in the process areas to detect the presence of blowing agent (Confidential Information). If blowing agent (Confidential Information) is detected, the source will be investigated through visual or gas detection inspection. Any leaks will be repaired.

(e) During extrusion, immediately in front of the die lips is an area of unexpanded gel known as the halo. Air rings inside and outside of the sheet apply air directly to the halo to properly skin the foam, thus reducing the emission of blowing agent into the atmosphere during extrusion.

(f) Visual inspections of all tubing and equipment for possible VOC emission leaks shall be performed once per shift.

(g) Daily inspections of the two (2) foam tandem extruders shall be performed to verify that there are no possible malfunctions in the operation.

(h) All readily visible and exposed piping and tubing shall be inspected daily for any possible leaks.

(i) The combustible gas meters shall be calibrated once per month.

(j) The unexpanded gel known as the halo shall be inspected daily to verify they are

operating properly.

Reason not incorporated: The VOC and BACT requirements of Operation Permit CP-143-9047-00016, issued on April 3, 1998 have been superseded by the requirements of Operation Permit 143-9851-00016, issued on November 19, 1998, which requires the use of a Thermal Oxidizer as BACT.

(4) Operation Permit CP143-12416-00016, issued on December 05, 2000.

Condition D.1.1(b):

That usage of VOC, delivered to the three (3) polystyrene extrusion lines shall be limited to 906.66 tons per twelve (12) month consecutive period. This is equivalent to VOC emissions of 170.43 tons per twelve (12) month consecutive period. During the first 365 days of operation, VOC usage shall be limited such that the total VOC used divided by accumulated months of operation shall not exceed the limits specified.

Reason not incorporated: The BACT analysis for CP143-12416-00016 was based on the polystyrene foam extrusion operation (EPS-1, EPS-2, EPS-3) and CPET foam tandem extruder (ECPET-1). However, the equivalent VOC emissions were based on only the polystyrene foam extrusion operation (EPS-1, EPS-2, EPS-3). Condition D.1.1 has been revised to include the maximum capacity of blowing agent used when extruding polystyrene has been reduced and the 326 IAC 8-1-6 limit, which formerly included only the polystyrene foam extrusion operation (EPS-1, EPS-2, EPS-3) has been revised to include the CPET foam tandem extruder (ECPET-1) in the BACT limit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on October 4, 1999.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 6.)

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a

stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	greater than 100, less than 250
PM-10	greater than 100, less than 250
SO_2	less than 100
VOC	greater than 250
CO	less than 100
NO_x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Hexane	0.16
TOTAL	0.17

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM-10 and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1999 Source Air Pollutant Emission Summary.

Pollutant	Actual Emissions (tons/year)
PM	11.56
PM-10	11.56
SO_2	0.00
VOC	174.55
CO	0.00
NO_x	0.00
HAP (specify)	0.00

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Natural Gas Combustion	0.17	0.17	0.05	0.50	7.69	9.15	0.17/ 0.16 Hexane
EPS-1	2.87	2.87	0.00	45.63	0.00	0.00	0.00
EPS-2	2.87	2.87	0.00	45.63	0.00	0.00	0.00
EPS-3	2.87	2.87	0.00	45.63	0.00	0.00	0.00
ECPET-1	3.45	3.45	0.00	43.02	0.00	0.00	0.00
Pre-Expansion Room Emissions	0.00	0.00	0.00	9.76	0.00	0.00	0.00
Pentane Emissions (Mold Machines)	0.00	0.00	0.00	54.60	0.00	0.00	0.00
Total Emissions	12.23	12.23	0.05	244.77	7.69	9.15	0.17/ 0.16 Hexane

County Attainment Status

The source is located in Scott County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Scott County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Scott County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in

effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) Pursuant to Part 70 Significant Source Modification No. 143-11382-00016, issued on February 10, 2000, the Foam Cup Line natural gas fired boiler, constructed on November 16, 2000, is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units). This boiler only burns natural gas, therefore pursuant to the requirements of Subpart Dc, record keeping of fuel type and amount of fuel used is required.

(b) The one (1) thirty-thousand 30,000 gallon storage tank, constructed on December 1, 1998, for the blowing agent (confidential information) for the ECPET-1 extruder is subject to the New Source Performance Standard, 326 IAC 12 (40 CFR 60.116b, Subpart Kb) because the capacity is greater than seventy-five cubic meters ($75m^3$) but less than one hundred fifty-one cubic meters ($151m^3$) with a maximum true vapor pressure of less than 15.0 kPa.

(1) The Permittee shall keep records readily accessible of the dimension of the storage tanks and an analysis showing the capacity of the storage tanks for the life of the source.

(c) The other 30,000 gallon storage tank, constructed on December 1, 1998, or the blowing agent (confidential information) is not subject to the New Source Performance Standard, 326 IAC 12 (40 CFR 60.116b, Subpart Kb) because it is a pressure vessel designed to operate in excess of 204.9 kPa and without emissions to the atmosphere. Pursuant to 40 CFR 60.110(d)(2), this subpart does not apply to this type of storage vessel.

(d) The Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids are not subject to the New Source Performance Standard, 326 IAC 12 (40 CFR 60.116b, Subpart Kb) because the capacity is less than forty cubic meters ($40m^3$).

(d) There are no other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(e) The degreasing operations are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T, because the degreasing operations use mineral spirits as their solvent, which is not one of the listed solvents applicable to this subpart.

(f) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-4.1 (New Sources Toxics Control)

This source, constructed after July 27, 1997, does not have the potential to emit (PTE) 10 tons per year of any single HAP or 25 tons per year of any combination of HAPs, therefore the requirements of 326 IAC 2-4.1 do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration), because the potential emissions of any pollutant after control are less than two hundred fifty (250) tons per year and it is not in one of the 28 listed source categories for this rule. Therefore, the Prevention of Significant Deterioration (PSD) rules, 326 IAC 2-2 and 40 CFR 52.21, will not apply.

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to Significant Source Modification 143-11382-00016, issued on February 10, 2000, the natural gas fired boiler on the Pre-Expansion Room, rated at 20.9 million British thermal units per hour, is subject to the particulate matter limitations of 326 IAC 6-2. Pursuant to this rule, the natural gas fired boiler on the Pre-Expansion Room is limited by the following equation from 326

IAC 6-2-4:

$Pt = 1.09/Q^{0.26}$

where: Pt = maximum allowable particulate matter (PM) emitted per MMBtu heat input
Q = total source max. indirect heater input = natural gas fired boiler on the Pre-Expansion Room = 20.9 MMBtu/hr

$Pt = 1.09/20.9^{0.26} = 0.49$ lbs PM/MMBtu

Therefore, the Foam Cup Line natural gas fired boiler is limited to 0.49 lbs PM/MMBtu.

compliance calculation:
(0.17 tons PM/yr) * (hr/20.9 MMBtu) * (yr/8,760 hrs) * (2,000 lbs/ton) = 0.002 lbs PM/MMBtu

Actual lbs PM/MMBtu (0.002) are less than allowable lbs PM/MMBtu (0.49), therefore the natural gas fired boiler on the Pre-Expansion Room will comply with the requirements of 326 IAC 6-2-4.

326 IAC 6-3-2 (Process Operations)

Pursuant to Operation Permit CP-143-9047-00016, issued on April 3, 1998 the particulate matter (PM) emissions shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

(a) The polystyrene foam scrap regrind operation shall be limited by the following:

$E = 4.10*0.1575^{0.67}$ where E = 1.19 lb/hr
$= 1.19$ lb/hr P = 0.1575 tons/hr

The fabric filter shall be in operation at all times the polystyrene foam scrap regrind is in operation, in order to comply with this limit.

(b) The CPET foam scrap regrind operation shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10*0.131^{0.67}$ where E = 1.05 lb/hr
$= 1.05$ lb/hr P = 0.131 tons/hr

The fabric filter shall be in operation at all times the CPET foam scrap regrind is in operation, in order to comply with this limit.

(c) The grinding and machining operations including the following: deburring; buffing; polishing; abrasive blating; pneumatic conveying and woodworking operations shall be limited by the following:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour;
and P = process weight rate in tons per hour

The control devices shall be in operation at all times the grinding and machining operations are in operation, in order to comply with this limit.

(d) The brazing equipment, cutting torches, soldering equipment, welding equipment shall be limited by the following:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour;
and P = process weight rate in tons per hour

brazing

326 IAC 8-1-6 (New Facilities: General Reduction Requirements)

(a) Pursuant to Operation Permit CP-143-9047-00016, issued on April 3, 1998, the two (2) blowing agent storage tanks are not subject to the requirements of 326 IAC 8-1-6 because these tanks are pressurized tanks with pressure relief valves for pressures above the operating temperatures and that under normal operating conditions and normal ambient temperature variations, the relief valve will not be triggered. Therefore, the potential VOC emissions are negligible and do not trigger the 25 ton per year threshold established under the rule.

(b) Pursuant to Significant Source Modification 143-12416-00016, issued on December 05, 2000, and 326 IAC 8-1-6, the Best Available Control Technology (BACT) for the polystyrene foam extrusion operation and CPET foam tandem extruder (including EPS-1, EPS-2, EPS-3 and ECPET-1) has been determined to be VOC emission control by a recuperative thermal oxidizer controlling exhaust from the repelletizer for the polystyrene foam extrusion operation (including EPS-1, EPS-2 and EPS-3). The BACT requires a 85% capture efficiency and a 95% destruction efficiency through the utilization of a RTO. The overall control efficiency is equivalent to 179.91 tons of VOC per twelve (12) consecutive month period (see page 3 of 6 of TSD Appendix A). The source shall meet the following:

(1) The recuperative thermal oxidizer shall be used at all times that the polystyrene foam repelletizing process is in operation.

(2) That usage of VOC, delivered to the polystyrene foam extrusion operation (including EPS-1, EPS-2 and EPS-3) shall be limited to 551.88 tons per 12 month consecutive period. This is equivalent to VOC emissions of 179.91 tons per 12 month consecutive period from the polystyrene foam extrusion operation and CPET foam tandem extruder (including EPS-1, EPS-2, EPS-3 and ECPET-1). During the first 12 months of operation, VOC usage shall be limited such that the total VOC used divided by accumulated months of operation shall not exceed the limits specified.

(c) That pursuant to Significant Source Modification 143-11382-00016, issued on February 10, 2000, and 326 IAC 8-1-6, the Best Available Control Technology (BACT), the boiler on the Pre-Expansion Room shall be in operation at all times that the Pre-Expansion Room is in operation. When operating, the boiler on the Pre-Expansion Room shall maintain a minimum operating temperatures of 1,400° F, or a temperature as determined in compliance tests in order to maintain at least 95% capture efficiency and a 95% destruction efficiency through the utilization of a boiler. These efficiencies are equivalent to VOC emissions from the Foam Cup Line (including M-1 and the Pre-Expansion Room) of less than 64.36 tons per twelve (12) consecutive month period for the maximum raw material usage of 3,500 tons per twelve (12) consecutive month period (see page 4 of 6 of TSD Appendix A). Compliance tests were completed on November 16, 2000 and resulted in a minimum operating temperature of 1,400° F. The source shall meet the following:

(1) The usage of the blowing agent, delivered to the Foam Cup Line, shall be limited to 182 tons per 12 month consecutive period. Which is equivalent to 64.36 tons of VOC per 12 month consecutive period. During the first 12 months of operation, the usage of the blowing agent shall be limited such that the total amount of blowing agent used divided by the accumulated months of operation shall not exceed the limits specified.

(2) The boiler controlling VOC emissions from the Pre-Expansion Room shall be in operation at all times that the Pre-Expansion Room is in operation; and

(3) no add-on controls for the Mold Machines, identified as M-1.

Operation at or above this minimum temperature ensures compliance with the BACT requirements of 326 IAC 8-1-6.

326 IAC 8-3-2 (Cold Cleaner Operations)

The degreasing operations (insignificant activity) are subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations) because this unit commenced operation after January 1, 1980 and emits VOC. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements; and

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The degreasing operations (insignificant activity) are subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations) because this unit commenced operation after July 1, 1990 and emits VOC. Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 8-4 (Petroleum Sources)

The two (2) blowing agent storage tanks are not subject to the provisions of this rule. The storage tanks are located in Scott County and are not used to store petroleum liquid.

Testing Requirements

Testing is not required for this source at this time.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) The polystyrene foam extrusion operation (including EPS-1, EPS-2 and EPS-3) has

applicable compliance monitoring conditions as specified below:

A continuous temperature monitoring system shall be calibrated, maintained, and operated on the recuperative thermal oxidizer for measuring operating temperature when the polystyrene foam repelletizing line is in operation when venting to the atmosphere. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test. The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. This pressure or amperage shall be maintained with the range as established in the most recent compliant stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading.

These monitoring conditions are necessary because the thermal incinerator for the polystyrene foam repelletizing line must operate properly to ensure compliance with 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) and 326 IAC 2-7 (Part 70).

(b) The Pre-Expansion Room has applicable compliance monitoring conditions as specified below:

A continuous temperature monitoring system shall be calibrated, maintained, and operated on the boiler controlling VOC emissions from the Pre-Expansion Room for measuring operating temperature when the Pre-Expansion Room is in operation when venting to the atmosphere. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test. The duct pressure or fan amperage shall be observed at least once per week when the boiler controlling VOC emissions from the Pre-Expansion Room is in operation. This pressure or amperage shall be maintained with the range as established in the most recent compliant stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading.

These monitoring conditions are necessary because the natural gas fired boiler for VOC control for the Pre-Expansion Room must operate properly to ensure compliance with 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this stationary polystyrene foam extrusion operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T143-11375-00016.**

Appendix A: Emission Calculations

Company Name: Genpak, LLC
Address City IN Zip: 845 South Elm Street, Scottsburg, IN 47170
TV: T143-11375-00016
Plt ID: 143-00016
Reviewer: LQ/EVP
Date: December 19, 2001

Uncontrolled Potential Emissions (tons/year)

	Emissions Generating Activity							
Pollutant	Natural Gas Combustion	EPS-1	EPS-2	EPS-3	ECPET-1	Pre-Expansion Room Emissions	Pentane Emissions (Mold Machines)	**TOTAL**
PM	0.17	277.25	277.25	277.25	68.99	0.00	0.00	831.92
PM10	0.70	277.25	277.25	277.25	68.99	0.00	0.00	832.45
SO2	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.05
NOx	9.15	0.00	0.00	0.00	0.00	0.00	0.00	9.15
VOC	0.50	94.72	94.72	94.72	38.05	100.10	56.40	441.16
CO	7.69	0.00	0.00	0.00	0.00	0.00	0.00	7.69
total HAPs	0.17	0.00	0.00	0.00	0.00	0.00	0.00	0.17
worst case single HAP	(Hexane) 0.16	0.00	0.00	0.00	0.00	0.00	0.00	(Hexane) 0.16
					removed			

Total emissions based on rated capacity at 8,760 hours/year.

Controlled Potential Emissions (tons/year)

	Emissions Generating Activity							
Pollutant	Natural Gas Combustion	EPS-1	EPS-2	EPS-3	ECPET-1	Pre-Expansion Room Emissions	Pentane Emissions (Mold Machines)	**TOTAL**
PM	0.17	13.86	13.86	13.86	3.45	0.00	0.00	41.75
PM10	0.70	13.86	13.86	13.86	3.45	0.00	0.00	42.28
SO2	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.05
NOx	9.15	0.00	0.00	0.00	0.00	0.00	0.00	9.15
VOC	0.50	56.81	56.81	56.81	38.05	9.76	54.60	235.29
CO	7.69	0.00	0.00	0.00	0.00	0.00	0.00	7.69
total HAPs	0.17	0.00	0.00	0.00	0.00	0.00	0.00	0.17
worst case single HAP	(Hexane) 0.16	0.00	0.00	0.00	0.00	0.00	0.00	(Hexane) 0.16
					removed			

Total emissions based on rated capacity at 8,760 hours/year, after control.

VOC Emissons
Polystyrene Foam Extrusion
Company Name: Genpak, LLC
Address City IN Zip: 845 South Elm Street, Scottsburg, IN 47170
TV: T143-11375-00016
PIt ID: 143-00016
Reviewer: LQ/EVP
Date: October 1, 2001

Emission Unit	Throughput			Uncontrolled Potential Emissions								
	Description	Average Rate (lb/hr)	Maximum Rate (lb/hr)	Extrusion, Warehouse and Thermoform		Repelletizer		Silo		Total		
				lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	lb/day	ton/yr
EPS-1	Virgin	978	978									
	Regrind	422	422									
	Blow. Ag.	69	69	2.28	9.97	10.72	46.95	8.63	37.80	21.63	519.04	94.72
EPS-2	Virgin	978	978									
	Regrind	422	422									
	Blow. Ag.	69	69	2.28	9.97	10.72	46.95	8.63	37.80	21.63	519.04	94.72
EPS-3	Virgin	978	978									
	Regrind	422	422									
	Blow. Ag.	69	69	2.28	9.97	10.72	46.95	8.63	37.80	21.63	519.04	94.72
ECPET-1	Virgin	565.2	565.2									
Removed	Regrind	315	315									
	Blow. Ag.	19.8	19.8	5.54	24.28	1.57	6.88	1.57	6.88	8.69	208.50	38.05

Emission Unit	Potential Emissions after Controls (85% Capture and 95% control on EPS Repelletizer)			
	Extrusion, Warehouse, and Thermoform ton/yr	Repell ton/yr	Silo ton/yr	Total ton/yr
EPS-1	9.97	9.04	37.80	56.81
EPS-2	9.97	9.04	37.80	56.81
EPS-3	9.97	9.04	37.80	56.81
ECPET-1 **Removed**	24.28	6.88	6.88	38.05

METHODOLOGY:
polystyrene
extrusion.
For EPS-1 through 3:
During extrusion, warehousing, and thermoforming there is an 3.3% loss of blowing agent (Confidential Information).
After extrusion, warehousing, and thermoforming, 29% of the materials are reground.
During regrind there is a 100% loss of blowing agent, 85% of which is captured and controlled at 95% efficiency.
and 55.4% from
repell.
For ECPET-1:
During extrusion, warehousing, and thermoforming there is a 28% loss of blowing agent (Confidential Information).
After extrusion, warehousing, and thermoforming, 35% of the materials are reground.
During regrind there is a 63% loss of blowing agent, 85% of which is captured and controlled at 95% efficiency.
E.G. (19.8*0.28 loss of blowing agent = 5.54 lbs/hr) and (19.8*0.72 remains after thermoforming*0.35 scrap*0.63 = 3.14 lbs /hr).

Particulate Matter Emissions
From Polystyrene Foam Extrusion

Company Name: Genpak, LLC
Address City IN Zip: 845 South Elm Street, Scottsburg, IN 47170
TV: T143-11375-00016
Plt ID: 143-00016
Reviewer: LQ/EVP
Date: December 19, 2001

	Install Date	Throughput			Potential Emissions			
		Description	Average Rate (lb/hr)	Maximum Rate (lb/hr)	Uncontrolled		Controlled	
					lb/hr	ton/yr	lb/hr	ton/yr
EPS-1	04/17/98	Regrind	422	1266	63.30	277.25	3.17	13.86
EPS-2	12/08/98	Regrind	422	1266	63.30	277.25	3.17	13.86
EPS-3		Regrind	422	1266	63.30	277.25	3.17	13.86
ECPET-1	1998	Regrind	315	315	15.75	68.99	0.79	3.45

METHODOLOGY:

When transferring materials 5% carryover occurs. (i.e. 5% of material could escape if not controlled)

Controlled potential emissions calculated using 95% efficiency fabric filter.

ECPET-1 has been removed.

VOC Emissions
From the Foam Cup Line

Company Name: Genpak, LLC
Address City IN Zip: 845 South Elm Street, Scottsburg, IN 47170
CP: 143-11375
Plt ID: 143-00016
Reviewer: PR/EVP
Date: October 4, 1999

Uncontrolled VOC Emissions
Foam Cup Line

	Raw Material			The Pre-Expansion Room		A percentage of pentane is retained in the product and not released. Therefore these emissions are not included in the total emissions.		Mold Machines		Facility Wide Emissions
Description	Maximum Throughput in lbs/yr	% Pentane in Raw Material	Total Pentane in Raw Material (tons/yr)	Pre-Expansion Room Emissions	Pentane Emissions without Boiler (tons/yr)	Pentane Remaining in Product	Pentane remaining in product (tons/yr)	Pentane Emissions (Mold Machines)	Pentane Emissions from Mold Machines (tons/yr)	Total Potential Emissions (tons/yr)
Foam Cup Line	7,000,000.00	5.20%	182.00	55.00%	100.10	15.00%	27.30	30.00%	54.60	**154.70**

Controlled VOC Emissions
Foam Cup Line

	Raw Material			The Pre-Expansion Room is controlled by a boiler. VOCs emissions are captured with 95% efficiency and destroyed with 95% efficiency, for an overall control efficiency of 90.25%.		A percentage of pentane is retained in the product and not released. Therefore these emissions are not included in the total emissions.		The Mold Machines are not equipped with control equipment. Mold Machine emissions are the only emissions from the line that are not captured. Therefore, Mold Machine emissions equal the total foam cup line emissions.		Facility Wide Emissions
Description	Maximum Throughput in lbs/yr	% Pentane in Raw Material	Total Pentane in Raw Material (tons/yr)	Pre-Expansion Room Emissions	Pentane Emissions with Boiler (tons/yr)	Pentane Remaining in Product	Pentane remaining in product (tons/yr)	Pentane Emissions (Mold Machines)	Pentane Emissions from Mold Machines (tons/yr)	Total Potential Emissions (tons/yr)
Foam Cup Line	7,000,000.00	5.20%	182.00	55.00%	9.76	15.00%	27.30	30.00%	54.60	**64.36**

METHODOLOGY:

Total Emissions captured by boiler) + (Pentane Remaining in Product) + (Pentane Emissions from Mold Machine) = Total Pentane in Raw Material (200,200 + 54,600 +109,200) lbs/year + 364,000 lb/yr

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Genpak, LLC
Address City IN Zip: 845 South Elm Street, Scottsburg, IN 47170
CP: T143-11375-00016
Plt ID: 143-00016
Reviewer: PR/EVP
Date: October 4, 1999

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
20.9	183.1

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.17	0.70	0.05	9.15	0.50	7.69

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-0 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions

Company Name: Genpak, LLC
Address City IN Zip: 845 South Elm Street, Scottsburg, IN 47170
CP: T143-11375-00016
Plt ID: 143-00016
Reviewer: PR/EVP
Date: October 4, 1999

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	0.00	0.00	0.01	0.16	0.00

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	0.00	0.00	0.00	0.00	0.00

Methodology is the same as page 1.

0.17

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.